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EG&G - ROCKY FLATS PLANT ENVIRONMENTAL MANAGEMENT

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ROCKY FLATS PLANT EMD ADMINISTRATION PROCEDURES MANUAL

Procedure No.: Page:

Manual No.:

3-21000-ADM

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CATEGORY 1

Effective Date: Organization:

**Environmental Management** 

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**ADMIN RECORD** 

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EG&G - ROCKY FLATS PLANT ENVIRONMENTAL MANAGEMENT

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4/18/92

Environmental Management

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#### 1 PURPOSE

This procedure describes the Environmental Management (EM) Department requirements for surveillance of department and subcontractor activities at the Rocky Flats Plant (RFP). The purpose of surveillance is to evaluate the effectiveness of existing plans, procedures, training, commitment, and other elements of the QA Program.

#### 2 SCOPE

This procedure applies when it is invoked by the QAPM. Surveillance covers evaluation of items, activities, and personnel performing functions that affect the quality of EM Department responsibilities. Subcontractor items, activities, and personnel are specifically included. This procedure may be invoked for the control of supplier evaluations, supplier performance evaluations, or source verifications.

#### 3 TERMS/DEFINITIONS

- 3.1 Surveillance Observing to evaluate whether requirements and methods specified in plans, procedures, and drawings provide adequate management control of items, activities, and personnel. A surveillance may determine the status, adequacy, and effectiveness of work activities.
- 3.2 Acceptance Criteria Criteria specified in contracts, statements of work, or other binding requirements documents. These criteria are used to evaluate the acceptability of items, processes, data, or services. Compliance with acceptance criteria is established prior to using items, and may be demonstrated by acceptance test procedures.
- 3.3 Effective For the purpose of EM Department surveillance, "effective" means that items, activities, or personnel satisfy specified criteria.

#### 4 RESPONSIBILITIES

- 4.1 The Quality Assurance Program Manager (QAPM) is responsible for the following:
  - 4.1.1 Developing and maintaining a surveillance schedule.
  - 4.1.2 Approving surveillance reports.
  - 4.1.3 Coordinating with EM Department management to schedule surveillances both within the EM Department and subcontractors.
  - 4.1.4 Designating surveillance personnel.
- 4.2 The Division Quality Assurance Coordinator (QAC) is responsible for the following:
  - 4.2.1 Provide input to surveillance schedules.
  - 4.2.2 Propose technically qualified surveillance personnel with approval of the responsible manager.
- 4.3 The Surveillance Team Leader is responsible for the following:
  - 4.3.1 Preparing surveillance notices and checklists.
  - 4.3.2 Coordinating the surveillance team's activities.
  - 4.3.3 Submitting the Surveillance Report to the QAPM and transmitting completed surveillance record packages to EMD records center.

Team Leaders may also participate in the surveillance.

- 4.4 Surveillance Personnel are responsible for the following:
  - 4.4.1 Provide input to surveillance notices, checklists and surveillance reports.
  - 4.4.2 Conducting their portion of the surveillance as directed by the QAPM or Surveillance Team Leader.

- 4.5 Responsible Managers for the items, activities, and personnel under surveillance are responsible for the following:
  - 4.5.1 Cooperating with surveillance personnel. Surveillance activities will impact work schedules. Cooperation between all parties involved will minimize any short term deleterious impacts and maximize the long term benefits of the surveillance program.
  - 4.5.2 Providing responses to deficiencies specified in the Surveillance Report.

#### 5 INSTRUCTIONS

#### 5.1 SURVEILLANCE SCHEDULE

- 5.1.1 A schedule of annual surveillance activities shall be prepared and issued by the QAPM. The QAPM shall coordinate with other EM Department management in order to develop the schedule. The QAPM shall also coordinate with designated surveillance personnel to ascertain frequency, agenda and number of surveillances needed to provide adequate coverage of technical activities. Additional unscheduled surveillance activities may be performed at the discretion of the QAPM.
- 5.1.2 The Surveillance Schedule shall be updated and issued at least annually, and shall reflect the following, as a minimum:
  - 5.1.2.1 Actual surveillance conducted within the year (scheduled and unscheduled).
  - 5.1.2.2 Planned surveillance to be conducted within the next year.
  - 5.1.2.3 Surveillance scope and scheduled date.
  - 5.1.2.4 Authentication by the QAPM, or designee.
- 5.1.3 The Surveillance Schedule shall be distributed to the EM Department Director, QAPM, Division Managers, designated QACs, and the EM records center. Authenticated Surveillance Schedules are QA Records.

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- 5.1.4 The QAPM shall maintain a log (Attachment 2) to assign unique identification numbers and should maintain the status of surveillance. The number may have the following format: "EMSURV-YY-NO".
  - 5.1.4.1 YY are the last two digits of the calendar year.
  - 5.1.4.2 NO is the next sequential number for this year.

EMSURV-90-22 is the 22nd surveillance done in 1990.

#### 5.2 SURVEILLANCE PERSONNEL

- 5.2.1 The QAPM shall designate surveillance personnel. Designated personnel shall be listed in the Surveillance Notice (Attachment 1). The surveillance team for a scientific investigation should include both technical and QA representatives, which may be one and the same.
- 5.2.2 Surveillance personnel shall not be selected from participants in the work being evaluated, and shall not be selected from personnel who report directly to the manager immediately responsible for performing the work.

#### 5.3 SURVEILLANCE CHECKLIST

- 5.3.1 A Surveillance Checklist (Attachment 3) shall be prepared by the Surveillance Team Leader for each surveillance. The checklist should identify the following:
  - 5.3.1.1 The surveillance identification number.
  - 5.3.1.2 The scope of items, activities, and personnel to be Evaluated.
  - 5.3.1.3 Typical QA Records (i.e., Purchase Orders, Contracts, procedures, and drawings) to be evaluated in the surveillance. (This would be an incomplete list).
  - 5.3.1.4 Name(s) of team members.

5.3.2 The surveillance team leader shall transmit the surveillance notice and checklist to the organization at least five working days prior to surveillance.

#### 5.4 SURVEILLANCE OBSERVATIONS AND CONDUCT

- 5.4.1 Significant surveillance observations shall be recorded as Nonconformance Reports. Surveillance team members should keep personal notes of all observations.
- 5.4.2 Surveillance team members should observe whether records are being completed in accordance with applicable procedures, and whether procedures specify records adequate to assure the quality of work and work products.
- 5.4.3 Surveillance team members should observe whether existing work practices and QA Program elements are effective in achieving and assuring both the:
  - 5.4.3.1 Quality of work and work products, and
  - 5.4.3.2 Regulatory compliance.
- 5.4.4 Surveillance team members should observe whether elements of the QA Program are unnecessarily complex or burdensome, or produce negative impacts on safety, quality, or environmental protection.
- 5.4.5 Surveillance team members should immediately communicate any concerns observed during the surveillance. Such communication should be expressed verbally to personnel on the scene or to the Responsible Manager, at the discretion of the team member.
- 5.4.6 Nonconformance reports shall be prepared as appropriate.

#### 5.5 DRAFT SURVEILLANCE REPORT

5.5.1 After completing the surveillance, team members shall prepare a draft Surveillance Report (cover page format is illustrated in Attachment 4), as described below.

- 5.5.2 The draft Surveillance Report shall include a statement regarding the effectiveness of the activity, operation, action or work that was observed during the course of the surveillance.
- 5.5.3 The draft Surveillance Report should describe any unusual, exemplary, and noteworthy practices observed.
- 5.5.4 The draft Surveillance Report shall identify each document observed and each person interviewed.

#### 5.6 CLOSE OUT MEETING

The Surveillance Team Leader shall schedule a close out meeting with the responsible manager(s) under surveillance. The purpose of the close out meeting is to discuss observations and concerns, clarify issues, correct misunderstandings, and set expectations. The close out meeting should eliminate errors of fact, but need not resolve other disagreements. (Resolution processes are defined elsewhere for Nonconformance Reports).

#### 5.7 FINAL SURVEILLANCE REPORT

- 5.7.1 The final Surveillance Report shall identify any nonconformance reports issued as a result of the surveillance.
- 5.7.2 The final Surveillance Report shall be authenticated by the Surveillance Team Leader, and approved by the QAPM.
- 5.7.3 Copies of the approved Surveillance Report shall be distributed to the appropriate Division Manager(s), the QAC, the QAPM, the EM Department Director, and the EM records center.

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#### 6 RECORDS

- 6.1 Surveillance Schedule
- 6.2 Surveillance Report
- 6.3 Non-Conformance Reports
- 6.4 Surveillance Check List
- 6.5 Surveillance Notice
- 6.6 QA Surveillance Log

The team leader shall submit these records, except for the surveillance log, as a package to the EMD Records Center.

#### 7 REFERENCES

7.1 EMD Procedure 3-21000-ADM, 15.01, Control of Nonconforming Items.

## ATTACHMENT 1 SURVEILLANCE NOTICE FORMAT

ENVIRONMENTAL MANAGEMENT DEPARTMENT	SURVEILLANCE NOTICE	Surveillance No.:
PROJECT/PROGRAM DESCRIPTION:		
SURVEILLANCE SCOPE:		
DOCUMENTS TO BE OBSERVED:	SAMO	
SCHEDULED DATE(S):		
SURVEILLANCE TEAM: TEAM LEADER:		
TEAM MEMBERS:		
QA Program Manager		Date

## ATTACHMENT 2 QA SURVEILLANCE LOG FORM

EAR	PAGE _	_ of _
SCHEDULED DATES	SURVEILLANCE SUBJECT/TEAM LEADER	REPORT ISSUED (DATE)
	MIL	
@		
		<del></del>
	SCHEDULED	SCHEDULÉD

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#### ATTACHMENT 3

#### SURVEILLANCE CHECKLIST FORMAT

### ROCKY FLATS PLANT ENVIRONMENTAL MANAGEMENT DEPARTMENT QAA 2.1 SURVEILLANCE RFP-EM-91-06

No.	Description	Citation •	Observation	<u>Documents</u> Observed*
1.01	Determine if a specific organizational structure has been developed for the activity under review.	Site-Wide QAPJP, Section 1.0, Paragraph 1.2		
1.02	Determine if the personnel identified in the organizational structure are the same persons conducting the work for the specified position.	Site-Wide QAPIP, Section 1.0, Paragraph 1.2		·
1.03	Determine if the subcontractor's organization '- specified by the QAA ' activity under reviev			
2.01	Determine if a QAA h.  developed and approve_ or the activity under review.	Site-Wide QAPjP, Section 2.0, Paragraph 2.3		
2.02	Verify that all personnel assigned to the task under review have documented evidence of training for their specific function.	Site-Wide QAPjP, Section 2.0, Paragraph 2.4.1; ER QAPD, Section 2.0, Paragraph 2.6		
• Indian	a "ALA" if not analisable			

## ATTACHMENT 4 SURVEILLANCE REPORT FORMAT

ENVIRONMENTAL MANAGEMENT DEPARTMENT	EMD Surveillance Report	Surveillence Ne.:
Surveillance Subject:		
Surveillence Scepe:		
Persennel Contacted:		
Surveillance Results:		
O Executive Summary:		
o Deficiencies:	\\~	
Surveillance Team:		
Team Leader:		
NCRs for deficiencies observed during thi	is surveillance are attached.	
QA Program Manager		Date